



June 23, 2017

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

**RE: CC Docket No. 96-45**

Dear Ms. Dortch:

The SHLB Coalition writes in support of Alaska Communications' request<sup>1</sup> to provide full funding for the Rural Health Care (RHC) Program. Even though the demand for RHC funding has increased substantially in the past year – exceeding the \$400 Million cap – the Public Notice issued by the Office of Managing Director (OMD) proposes to collect less than \$0 for the third quarter of 2017 for the RHC program. Without taking public comment or going through a rulemaking proceeding, the Public Notice proposes to change existing policy and to use reserve funds from prior years to cover the RHC demand for the upcoming quarter. This policy change is a dramatic departure from prior practice.

As the Commission well knows, the RHC program was under-funded for the last fiscal year, which resulted in many RHC applicants suffering a 7.5% reduction in support. This funding shortfall has required some health care entities to curtail their broadband connectivity, and it has caused some telehealth networks to stop their plans to expand deployment of additional telehealth facilities. This reserve funding could and should be used to cover the 7.5% shortfall in funding. We completely agree with the filing from Alaska Communications that states “The Commission should not be looking to accumulated reserves for short-term reductions in contributions but instead should try to apply those reserves for the purpose for which they were collected, to maximize the availability of advanced telecommunications and information services to all Americans on an affordable basis.”

To put the matter more directly, the Commission has the opportunity to save lives by allocating this reserve funding to support telemedicine connections in rural areas of the country. This is not just a matter that affects Alaska; this funding can benefit the provision of telemedicine services all across the U.S. We are aware of several RHC applicants that could use

---

<sup>1</sup> See Letter from Karen Brinkmann on behalf of Alaska Communications submitted in this docket on June 20, 2017.

this funding to improve the quality of telemedicine services in rural areas of the country. Because the reserve funds have already been collected, there is no harm to consumers' telephone bills by using this reserve funding to improve telehealth network connectivity. We encourage the Commission to provide full funding for the RHC program in the third quarter and in the future.

Please feel free to contact me directly if you have any questions about this letter. I can be reached at [jwindhausen@shlb.org](mailto:jwindhausen@shlb.org) or by phone at (202) 256-9616.

Sincerely,

A handwritten signature in dark ink that reads "John Windhausen, Jr." with a stylized flourish at the end.

John Windhausen, Jr.  
Executive Director  
Schools, Health & Libraries Broadband (SHLB) Coalition  
1250 Connecticut Ave. NW Suite 200  
Washington, DC 20036  
(202) 263-4626  
[www.shlb.org](http://www.shlb.org)

cc: Jay Schwarz and Nick Degani, Office of Chairman Pai  
Amy Bender, Office of Commissioner O'Rielly  
Claude Aiken, Office of Commissioner Clyburn  
Kris Monteith, Chief, Wireline Competition Bureau  
Karen Lee, Vice President, Schools and Libraries Program, USAC  
Mark Stephens, Managing Director  
Dana Schaffer, Office of Managing Director  
P. Michele Ellison, Chair, Connect2Health Task Force